

**IN THE UNITED STATES DISTRICT COURT
FOR SOUTH DAKOTA**

RELIANCE TELEPHONE OF GRAND FORKS INCORPORATED, a North Dakota corporation,)	Civil No. 4:24-cv-04098-ECS
and)	
RELIANCE SYSTEMS INC., a Nevada corporation,)	
Plaintiffs,)	PLAINTIFFS' MOTION TO COMPEL PRODUCTION OF DOCUMENTS FROM DEFENDANT NETWORK COMMUNICATIONS INTERNATIONAL CORP.
v.)	
YANKTON COUNTY, SOUTH DAKOTA,)	
and)	
NETWORK COMMUNICATIONS INTERNATIONAL CORP., a Texas corporation,)	
Defendants.)	

Pursuant to Rules 26, 34 and 37 of the Federal Rules of Civil Procedure, Plaintiffs Reliance Telephone of Grand Forks Incorporated (“Reliance Telephone”) and Reliance Systems Inc. (“Reliance Systems”) (collectively “Plaintiffs”) hereby move to compel Defendant Network Communications International Corp. (“NCIC”) to produce all documents it has withheld from production based in whole or in part on a claim of common interest or joint defense privilege. Alternatively, Plaintiffs move this Court to order NCIC to submit all such withheld documents for *in camera* review. This motion based on the Plaintiffs’ Memorandum in Support of their Motion to Compel Discovery from NCIC, and the supporting declarations and exhibits filed and served contemporaneously herewith.

Dated: April 4, 2025.

/s/ Patrick L. Sealey

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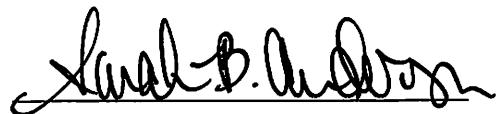
and

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*Attorneys for Plaintiff Reliance Telephone of
Grand Forks Incorporated and Reliance
Systems Inc.*

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing pleading was served upon all parties to the above action by depositing the same in the U.S. Mail, postage pre-paid, to their respective mailing addresses disclosed on the pleadings or, in the event the party is represented by counsel, to their counsel; or notice of the filing of this instrument was sent by e-mail, via CM/ECF, to all parties on the service list who have registered to receive service by e-mail over CM/ECF, on April 4, 2025.

A handwritten signature in black ink, appearing to read "Sarah B. Anderson".